

MARSHALL C. WALLACE (BAR NO. 127103)  
WILLIAM W. HUCKINS (BAR NO. 201098)  
MOLLY A. O'TOOLE (BAR NO. 333953)  
ALLEN MATKINS LECK GAMBLE  
MALLORY & NATSIS LLP  
Three Embarcadero Center, 12th Floor  
San Francisco, CA 94111-4074  
Phone: (415) 837-1515  
Fax: (415) 837-1516  
E-Mail: mwallace@allenmatkins.com  
whuckins@allenmatkins.com  
motoole@allenmatkins.com

TOM R. NORMANDIN (BAR NO. 102265)  
MICHAEL G. DAWE (BAR NO. 94987)  
PRENOVOST, NORMANDIN, DAWE & ROCHA  
A PROFESSIONAL CORPORATION  
2122 North Broadway, Suite 200  
Santa Ana, California 92706-2614  
Phone: (714) 547-2444  
Fax: (714) 835-2889  
E-Mail: tnormandin@pnbd.com  
mdawe@pnbd.com

Attorneys for Plaintiff  
PSG CAPITAL PARTNERS, INC.

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

In re:  
BRUGNARA PROPERTIES VI,  
Debtors.

Case No. 17-30501-DM  
(Adversary Proceeding No. 20-03003)  
Chapter 7

PSG CAPITAL PARTNERS, INC., a California  
corporation,

Plaintiff,

vs.

UNITED STATES OF AMERICA,  
DEPARTMENT OF THE TREASURY,  
INTERNAL REVENUE SERVICE,

Defendant.

**STIPULATION FOR ORDER OF  
DISMISSAL WITHOUT PREJUDICE OF  
ADVERSARY PROCEEDING NO. 20-03003**

1 Pursuant to a Settlement Agreement, Plaintiff PSG Capital Partners, Inc. and Defendant the  
2 United States of America, Department of the Treasury, Internal Revenue Service, by and through  
3 their attorneys of record, stipulate to an order dismissing the above-captioned Adversary Proceeding  
4 without prejudice, with each side bearing its own attorneys' fees and costs.

5 Dated: May 3, 2021

ALLEN MATKINS LECK GAMBLE  
MALLORY & NATSIS LLP

7 By: /s/ Marshall C. Wallace

8 MARSHALL C. WALLACE  
9 Attorneys for Plaintiff, PSG Capital Partners,  
Inc.

10 Dated: May 3, 2021

PRENOVOST, NORMANDIN, DAWE &  
ROCHA, A PROFESSIONAL CORPORATION

12 By: /s/ Tom R. Normandin

13 TOM R. NORMANDIN  
Attorneys for Plaintiff, PSG Capital Partners, Inc.

14 Dated: May 3, 2021

UNITED STATES DEPARTMENT OF  
JUSTICE, TAX DIVISION

16 By: /s/ Mahana K. Weidler

17 MAHANA K. WEIDLER  
18 Attorneys for Defendant, United States of  
America, Department of the Treasury,  
Internal Revenue Service